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February 26, 2018

**VIA ECF & FACSIMILE (212-805-6737)**

Honorable George B. Daniels  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 1310  
New York, New York 10017

**Re: *Lockheed Martin Corp. v. Glencore Ltd.*,  
Case No. 15-cv-03636 (GBD)  
Adjournment of Motion and Pre-trial Deadlines**

Dear Judge Daniels:

This firm represents plaintiff Lockheed Martin Corporation ("Lockheed Martin") in the above-referenced action ("Action"). I write to request an adjournment of the Feb. 27, 2018, Case Management Conference and all motion and pre-trial deadlines set forth in paragraphs 2 through 7 of the Fourth Amended Revised Scheduling Order [ECF No. 91] ("Scheduling Order") while to parties explore the potential for settlement of the case. Counsel to Glencore Ltd. has consented to this request.

Over the past several days, the parties made progress on identifying a path forward for a meaningful dialogue regarding resolution of the case and agreed to seek the Court's permission to focus their efforts on potential settlement at this time, prior to submitting dispositive motions. The parties will still complete the one outstanding deposition scheduled for March 2, 2018, so that all fact discovery is completed according to the Scheduling Order.


If the Court approves the parties' request, we will report back to the court no later than May 25, 2018 on the status of the discussions.

We appreciate the Court's consideration of this request.

BEVERIDGE & DIAMOND<sub>PC</sub>

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Respectfully,

A handwritten signature in black ink, reading "Paula J. Schauwecker". The signature is written in a cursive style with a long horizontal flourish at the end.

Paula J. Schauwecker

cc: All Counsel of Record (via ECF)

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